

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	Case No.5: 20 CR 297
)	
Plaintiff,)	Judge Donald C. Nugent
)	
v.)	<u>DEFENDANT'S MOTION FOR</u>
)	<u>PRE-PLEA PRESENTENCE REPORT</u>
MATTHEW P. SLATZER,)	<u>AS TO CRIMINAL HISTORY ONLY</u>
)	
Defendant.)	
)	

NOW COMES Defendant, by and through his attorney, and respectfully moves this Honorable Court for an Order instructing the Probation Department to prepare a pre-plea presentence report as to his criminal history only. The reasons for this Motion are explained below.

Defendant has a complicated and extensive criminal history. A pre-plea pre-sentence report as to same will lead to a swifter resolution of this matter.

For all the foregoing reasons, Defendant respectfully requests an Order from this Court instructing the Probation Department to prepare a pre-plea pre-sentence report as to his criminal history.

Respectfully submitted,

s/Anthony J. Vegh
Anthony J. Vegh
526 Superior Ave., East
Suite 220
Cleveland, Ohio 44114
P (216) 566-1424
F (216) 566-1468
avegh@vecchio-vegh.com
(Ohio Bar Reg No. 0039603)
Counsel for Defendant

CERTIFICATE OF SERVICE

A copy of the foregoing was electronically served on this 17th day of June, 2020. Notice of this filing will be sent to all counsel indicated on the electronic receipt by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Anthony J. Vekh